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16 Metropolitan Life Insurance Company
17 and Kaiser Permanent Flexible Benefits
18 Plan

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION

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SANDRA STEIN, } CASE NO.: C05-02566 EMC
vs. } Hon. Edward M. Chen
KAISER PERMANENTE FLEXIBLE } STIPULATION OF COUNSEL FOR
BENEFITS PLAN and } THIRTY-DAY EXTENSION OF TIME
METROPOLITAN LIFE INSURANCE } WITHIN WHICH DEFENDANTS
COMPANY, } MAY RESPOND TO PLAINTIFF'S
Defendants. } COMPLAINT ; ORDER
Complaint Filed: June 23, 2005

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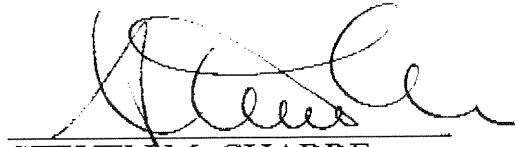
Pursuant to FRCP 6(b) and L.R. 6-1, Plaintiff Sandra Stein ("Plaintiff") and Defendants Metropolitan Life Insurance Company ("MetLife") and Kaiser Permanent Flexible Benefits Plan ("Kaiser") (collectively "Defendants"), by and through their respective counsel, hereby stipulate to extend the time within which Defendants may

1 answer or otherwise respond to the initial Complaint filed by Plaintiff on June 23,
2 2005 and served upon Kaiser on August 22, 2005 and upon MetLife on September 7,
3 2005.

4 Specifically, Defendants shall have an additional thirty (30) days from the
5 response date in which to answer or otherwise respond, such that a pleading filed by
6 Defendants on or before October 12, 2005 shall be deemed timely. Good cause exists
7 for this extension because Defendants have only recently retained counsel, and
8 additional time is needed to gather all relevant plan documents and all matters
9 previously reviewed and considered in connection with Plaintiff's disability claim
10 (*i.e.*, the "Administrative Record"), to formulate their interim litigation strategy and
11 to prepare their actual responsive pleadings.

12 DATED: September 9, 2005

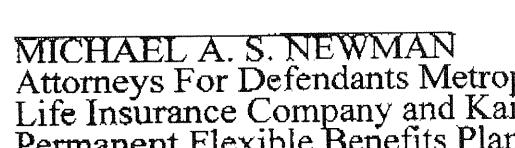
13 THE LAW OFFICE OF STEVEN M.
14 CHABRE

15 By: 

16 STEVEN M. CHABRE
17 Attorneys for Plaintiff
18 Sandra Stein

19 DATED: September 9, 2005

20 BARGER & WOLEN LLP

21 By: 

22 MICHAEL A. S. NEWMAN
23 Attorneys For Defendants Metropolitan
24 Life Insurance Company and Kaiser
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THE LAW OFFICE OF STEVEN M.
CHABRE

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Bv:

16 STEVEN M. CHABRE
17 Attorneys for Plaintiff
18 Sandra Stein

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DATED: September 9, 2005

BARGER & WOLEN LLP

By:

M. A. Newman
MICHAEL A. S. NEWMAN
Attorneys For Defendants Metropolitan
Life Insurance Company and Kaiser
Permanent Flexible Benefits Plan

IT IS SO ORDERED

EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE
Dated: 9/19/05

